

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
	)	CRIMINAL NO.: 05-M-0471-RBC
v.	)	
	)	
JANICE PIERRE	)	

JOINT MOTION FOR CONTINUANCE OF PRELIMINARY HEARING  
AND TO EXCLUDE TIME

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through her attorney James Krasnoo, Esq., jointly move to continue the Preliminary Hearing currently scheduled for October 3, 2005 at 2:00 p.m. until any day the week of November 28, 2005. As grounds therefore, the parties state that the parties need this additional time to discuss issues relating to the case, which could impact the government's charging decisions in this matter.

Additionally, the parties move, pursuant to 18 U.S.C. §3161 (h)(8)(A), to exclude the period of time commencing on September 12, 2005 and ending on the date the Court sets for the preliminary hearing in this matter from the period in which an indictment must be filed pursuant to 18 U.S.C. §3161(b). As grounds therefor, the parties state that the interests of justice are best served by allowing the parties additional time to attempt to resolve this case prior to indictment.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice served by granting the requested continuance and exclusion outweigh the best interest of the public and the defendant in a speedy indictment, and, accordingly, grant the continuance as requested above and exclude the above period in computing the time within which an indictment must be filed under 18 U.S.C. §3161.

Respectfully Submitted,

JANICE PIERRE  
By her attorney

MICHAEL J. SULLIVAN  
United States Attorney  
By:

/s/James Krasnoo  
JAMES KRASNOO, ESQ.  
978-475-9955

/s/ Seth P. Berman  
SETH P. BERMAN  
Assistant U.S. Attorney  
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September 28, 2005